

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

Liana Davis,

Plaintiff,

v.

Christopher Coopridier,
Aid Access GmbH, &
Rebecca Gomperts,

Defendants.

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Case No. 2:25-cv-220

DEFENDANT CHRISTOPHER COOPRIDIER'S
MOTION TO COMPEL NON-PARTY SUBPOENA AND DWQ

TO THE HONORABLE JUDGE OF SAID COURT:

Defendant Christopher Coopridier (“Defendant”) files this, its Motion to Compel Medical Records from Non-Party, Corpus Christi Medical Center – Bay Area, and would respectfully show the Court as follows:

I. INTRODUCTION & BACKGROUND

1.1. This is a wrongful death lawsuit where Plaintiff alleges Defendant caused the death of her unborn child by providing abortion-inducing drugs to her when she was pregnant for the purpose of inducing an abortion (the “Incident”). See Tex. Civ. Prac. & Rem Code § 71.002(b) and Section 171.063 of the Texas Health and Safety Code; *see also* [Dkt 1 at 28]. Plaintiff Liana Davis (“Davis”) claims that Defendant got her pregnant and when he found out, purchased abortion inducing medication from Aid Access GmbH, which is located in Amsterdam, for the purposes of allegedly trying to “murder” her unborn child. [Dkt 1 at 5].

1.2. Davis further alleges that on April 5, 2025, Defendant manipulated her into thinking he wanted to come over to her residence for a “trust building” session with her but secretly, without

her knowledge, laced her hot chocolate with the abortion pills he obtained from Aid Access. [Dkt 1 at 21-22]. Davis claims that she began hemorrhaging 30 minutes after drinking the “contaminated” hot chocolate. [Dkt 1 at 22]. Davis miscarried the fetus. [Dkt 1 at 27].

1.3. Based on responses to Plaintiff’s Initial Disclosures under Rule 26(a)(1) of the Federal Rules of Civil Procedure served by Davis in this case (Exhibit A), on March 2, 2026, Defendant issued and filed a *Subpoena and Notice of Intention to take the Deposition by Written Questions* directed to Corpus Christi Medical Center – Bay Area for Davis’s billing records. (Exhibit B). Plaintiff did not file any objections or seek to quash Defendant’s issuance of his *Notices of Intention to Take Deposition by Written Questions* to Corpus Christi Medical Center – Bay Area.

1.4. However, Corpus Christi Medical Center – Bay Area has refused to comply with the Subpoena and Notice of Intention to Take Deposition by Written Questions. *Please see* Exhibit C. In order to evaluate Davis’s claims, prepare for deposition, and prepare for trial, Defendant is entitled to review Plaintiff’s relevant medical and billing records. Corpus Christi Medical Center – Bay Area treated Davis for similar issues related to those in this case. *Please see* Exhibit A.

1.5. Medical, billing, and radiological records from healthcare professionals who have provided medical treatment for injuries Plaintiff allegedly sustained as a result of Defendant’s conduct are discoverable in this case. Further, Plaintiff’s medical records received to date report several medical conditions that were in existence prior to the alleged Incident, which places Plaintiff’s pre-accident health status into controversy. Therefore, the deposition by written questions that seek medical records from Plaintiff’s medical providers from prior Incident conditions are also relevant and discoverable.

II. ARGUMENT & AUTHORITIES

2.1. The purpose of discovery is to seek the truth so disputes may be decided by what the facts reveal and not by what facts are concealed. *Axelson, Inc. v. McIhany*, 798 S.W.2d 550, 555 (Tex. 1990). Discovery may be obtained about any matter relevant to the subject matter of the case. TEX. R. CIV. P. 192.3(a). Information is discoverable as long as it appears “reasonably calculated to lead to the discovery of admissible evidence.” *Id.* When a party refuses to comply with proper discovery requests, the party seeking discovery may file a motion to compel the other party to respond. TEX. R. CIV. P. 215.1(b).

2.2. In the present case, it is necessary for the Court to compel Corpus Christi Medical Center – Bay Area to comply with the Subpoena and Deposition by Written Questions regarding Liana Davis.

A. Defendant Seeks Only Relevant Healthcare Information Pertaining to Liana Davis

2.3. Medical information is discoverable if the record is relevant to an issue of the physical, mental, or emotional condition of a patient in a proceeding in which any party relies on the condition as part of its claim or defense. TEX. R. EVID. 509(e)(4); *see In re Collins*, 286 S.W.3d 911, 916 (Tex. 2009). This Court should grant Defendant’s Motion to Compel because: (1) the records are relevant and proportional under Rule 26(b)(1) because plaintiff has placed her medical condition at issue; (2) any physician-patient privilege or HIPAA-based objection is overcome because the plaintiff’s medical condition is central to the litigation; and (3) the nonparty’s refusal, absent a specific and detailed showing of undue burden, cannot withstand the heavy burden required to resist a properly issued subpoena.

Defendant is seeking Davis’s medical and billing records regarding her condition so that he can adequately defend against Plaintiff’s claims. Both Davis’s pre- and post-Incident medical condition regarding prior pregnancies or any conditions that may affect pregnancy is both relevant

and necessary to the defense of this case. *See* TEX. R. EVID. 509(e)(4); *see In re Collins*, 286 S.W.3d 911, 916 (Tex. 2009). For these reasons, Defendant's Motion to Compel should be granted.

III. CONCLUSION & PRAYER

3.1. This is not a case in which Defendant is seeking Davis's medical and billing records on a hunch. Plaintiff provided the name of this medical care provider in her responses to disclosures. *Please see* Exhibit A.

3.2. Preventing access to those records would be severely prejudicial to the defense of this case because Plaintiff is accusing Defendant of murdering their unborn child. Defendant seeks medical and billing records from healthcare professionals that Plaintiff sought treatment from. This material is relevant to Defendant's defenses. The records are therefore discoverable in this case. As such, Defendant's Motion to Compel should be granted.

BASED ON THE FOREGOING, Defendant asks the Court to grant its Motion to Compel, to issue an order compelling Corpus Christi Medical Center – Bay Area to produce the requested medical records, as well as for all further relief to which it may be entitled.

Respectfully submitted,

/s/ Victoria L. Jimenez
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Telephone: (512) 479-0500
Facsimile: (512) 479-0501

CERTIFICATE OF SERVICE

I hereby certify that on July 7, 2026, a copy of the foregoing pleading was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to all parties by operation of the court's electronic filing system.

/s/ Victoria L. Jimenez
Victoria L. Jimenez

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

Liana Davis,

Plaintiff,

v.

Case No. 2:25-cv-220

**Christopher Coopridier; Aid Access
GmbH; Rebecca Gomperts,**

Defendants.

PLAINTIFF’S INITIAL DISCLOSURES UNDER RULE 26(a)(1)

Plaintiff Liana Davis makes these initial disclosures in accordance with Fed. R. Civ. P. 26(a)(1):

1. “The name and, if known, the address and telephone number of each individual likely to have discoverable information—along with the subjects of that information—that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment,” Fed. R. Civ. P. 26(a)(1)(A)(i).

Name, Address, and Phone Number	Connection with Case and Summary
Liana Davis c/o Jonathan F. Mitchell Mitchell Law PLLC 111 Congress Avenue, Suite 400 Austin, Texas 78701 (512) 686-3940	Plaintiff with knowledge of the facts and circumstances related to the plaintiff’s allegations.
Mary Anna Ziarko c/o Jonathan F. Mitchell Mitchell Law PLLC 111 Congress Avenue, Suite 400 Austin, Texas 78701 (512) 686-3940	Mother of plaintiff who was left waiting outside her apartment for Coopridier to pick her up shortly after midnight on April 6, 2025, and who had to take an Uber to Ms. Davis’s house when Coopridier no-showed.

Any Lab Test Now 5417 Everhart Road Corpus Christi, Texas 78411 (361) 400-0707	Laboratory that has medical records of Ms. Davis in its possession
Christine Canterbury, MD 7111 South Padre Island Drive Corpus Christi, Texas 78412 (361) 851-5000	Ms. Davis's OB/GYN who has medical records of Ms. Davis in her possession
Corpus Christi Women's Clinic 7111 S. Padre Island Drive Corpus Christi, Texas 78412 (361) 851-5000	OB/GYN clinic where Dr. Canterbury practices that has medical records of Ms. Davis in its possession
Corpus Christi Medical Center Bay Area 7101 S. Padre Island Drive Corpus Christi, Texas 78412 (361) 761-1000	Hospital where Ms. Davis was treated after the poisoning that has medical records of Ms. Davis in her possession
Pregnancy Center of Coastal Bend 6133 Ennis Joslin Road Corpus Christi, Texas 78412 (361) 991-2008	Pregnancy resource center that can attest that Ms. Davis had every intent of carrying her pregnancy to term and giving birth to her unborn daughter.
Jackie Samuelson 6321 Oso Parkqay Corpus Christi, Texas 78414 (585) 729-9588	Neighbor of Ms. Davis who drove her to the hospital after the poisoning when Coopridier abandoned Ms. Davis after promising to take her to the hospital.
Casey Pyle 6522 Paddington Drive Corpus Christi, Texas 78414 (361) 960-5978	Friend of Ms. Davis who will debunk many of the false claims that appear in Coopridier's responsive pleading
Kristy Loesel 6813 Mets Court Corpus Christi, Texas 78414 (814) 823-4615	Friend of Ms. Davis who stayed with her during her hospitalization in the emergency room and witnesses her condition and medical care.

2. “A copy—or a description by category and location—of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment,” Fed. R. Civ. P. 26(a)(1)(A)(ii).

Exhibits 1–43 to the plaintiff’s complaint will be used to support Ms. Davis’s claims and defenses in this case. Ms. Davis has additional text messages and communications between her and Coopridier in her possession that may also be used to support her claims and defenses.

3. “A computation of each category of damages claimed by the disclosing party—who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered,” Fed. R. Civ. P. 26(a)(1)(A)(iii).

Ms. Davis is claiming the following categories of damages: (a) Compensatory damages for all medical expenses resulting from Ms. Davis’s hospitalization and emergency-room visit after Coopridier poisoned her and her unborn child with misoprostol; (b) Compensatory damages for lost companionship and loss of consortium resulting from Coopridier’s murder of Ms. Davis’s unborn child; (c) Compensatory damages for the mental anguish and emotional distress that Ms. Davis suffered on account of Coopridier’s murder of her unborn child; (d) Compensatory damages for the pain and suffering that Ms. Davis and her unborn child experienced as the result of Coopridier’s decision to poison Ms. Davis and murder her unborn child with misoprostol; (e) Compensatory damages for lost income that would have been earned by Ms. Davis’s unborn child; (f) Exemplary damages under section 71.009 of the Texas Civil Practice and Remedies Code, as Coopridier’s poisoning of Ms. Davis and her unborn child was a “wilful act” within the meaning of the statute.

4. “[F]or inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment,” Fed. R. Civ. P. 26(a)(1)(A)(iii).

None.

Respectfully submitted.

/s/ Jonathan F. Mitchell
JONATHAN F. MITCHELL
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111 Congress Avenue, Suite 400
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jonathan@mitchell.law

Dated: October 4, 2025

Counsel for Plaintiff Liana Davis

CERTIFICATE OF SERVICE

I certify that on October 4, 2025, I served this document by e-mail upon:

MIKAL C. WATTS
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/s/ Jonathan F. Mitchell
JONATHAN F. MITCHELL
Counsel for Plaintiff Liana Davis



651 Allendale Road
P. O. Box 61591
King of Prussia, PA 19406
Phone: (800) 220-1291
Fax: (610) 354-8946
Custodial portal: www.recordtrak.com/portal
Email: rcu@magnals.com

Phone:

Fax:

Custodial portal:

Email:

March 2, 2026

**BILLING DEPARTMENT
CORPUS CHRISTI MEDICAL CENTER - BAY AREA
8101 W. SAM HOUSTON PARKWAY SO
SUITE 100
HOUSTON TX 77072**

RT#.Tag: 475675.11

**Re: LIANA DAVIS
6329 OSO PARKWAY
CORPUS CHRISTI, TX 78414**

SS #: ###-##-6483

DOB: 03/17/1988

DOD: / /

Dear Record Custodian:

Attached is a **subpoena** requiring you to furnish the following materials.

Any and all billing records from 11/01/2024 to present, including but not limited to, any bills, invoices, receipts, itemized statements, financial record screen shots/print screens, CPT codes, UB forms, records reflecting payments made, adjustments, write-offs, charges, insurance records, table of billing codes, any type of correspondence, memos, bills, reports, claim forms, applications for medical benefits, office notes, every such record, including but not limited to, those existing in electronic or magnetic form and other memoranda, and every such record in the possession, custody, and control of said witness, and every such record to which the witness may have access. Including but not limited to records from 7101 S. Padre Island Dr. Corpus Christi, TX.

IMPORTANT:

- Contact **within 7 days of receipt** of this document with a page count and pricing for approval. **DO NOT COPY OR SEND PRIOR TO APPROVAL.**

Upload responses to www.recordtrak.com/portal

- Responses will not be accepted without completed and signed certification page(s).
- If records can't be uploaded through our portal, please fax to the fax number listed above or mail paper copies to the address listed above.
- Include your Federal Tax ID number on all invoices.
- Refer to **File # 475675 and tag 11** on all correspondence.

Sincerely,

**Records Representative
Phone: (800) 220-1291**

USDC-TX-S

Attestation Regarding a Requested Use or Disclosure of Protected Health Information Potentially Related to Reproductive Health Care

The entire form must be completed for the attestation to be valid.

Name of person(s) or specific identification of the class of persons to receive the requested PHI.
BARRY A. MOSCOWITZ , through Magna Legal Services as his/her designated record retrieval agent.
Name or other specific identification of the person or class of persons from whom you are requesting the use or disclosure.
CORPUS CHRISTI MEDICAL CENTER - BAY AREA
Description of specific PHI requested, including name(s) of individual(s), if practicable, or a description of the class of individuals, whose protected health information you are requesting.
Any and all billing records from 11/01/2024 to present, including but not limited to, any bills, invoices, receipts, itemized statements, financial record screen shots/print screens, CPT codes, UB forms, records reflecting payments made, adjustments, write-offs, charges, insurance records, table of billing codes, any type of correspondence, memos, bills, reports, claim forms, applications for medical benefits, office notes, every such record, including but not limited to, those existing in electronic or magnetic form and other memoranda, and every such record in the possession, custody, and control of said witness, and every such record to which the witness may have access. Including but not limited to records from 7101 S. Padre Island Dr. Corpus Christi, TX. PERTAINING TO: LIANA DAVIS DOB: 03/17/1988

I attest that the use or disclosure of PHI that I am requesting is not for a purpose prohibited by the HIPAA Privacy Rule at 45 CFR 164.502(a)(5)(iii) because of one of the following (check one box):

- ☒ The purpose of the use or disclosure of protected health information is **not** to investigate or impose liability on any person for the mere act of seeking, obtaining, providing, or facilitating reproductive health care or to identify any person for such purposes.
- ☐ The purpose of the use or disclosure of protected health information **is** to investigate or impose liability on any person for the mere act of seeking, obtaining, providing, or facilitating reproductive health care, or to identify any person for such purposes, but the reproductive health care at issue was **not lawful** under the circumstances in which it was provided.

I understand that I may be subject to criminal penalties pursuant to 42 U.S.C. 1320d-6 if I knowingly and in violation of HIPAA obtain individually identifiable health information relating to an individual or disclose individually identifiable health information to another person.

Signature of the person requesting the PHI

/s/ BARRY A. MOSCOWITZ _____

Date March 2, 2026

If you have signed as a representative of the person requesting PHI, provide a description of your authority to act for that person.

Magna Legal Services is authorized by the requesting attorney or insurance company, who has engaged us to submit this attestation as part of their record retrieval request.

This attestation document may be provided in electronic format, and electronically signed by the person requesting protected health information when the electronic signature is valid under applicable Federal and state law.

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

UNITED STATES DISTRICT COURT
for the
SOUTHERN DISTRICT OF TEXAS

LIANA DAVIS,

Plaintiff

v.

CHRISTOPHER COOPRIDER; AID ACCESS GmbH, REBECCA
GOMPERTS,*Defendant*

Civil Action No. 2:25-cv-220

SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION**To CORPUS CHRISTI MEDICAL CENTER - BAY AREA***(Name of person to whom this subpoena is directed)*

☒ **Testimony:** YOU ARE COMMANDED to appear at the time, date, and place set forth below to testify at a deposition to be taken in this civil action. If you are an organization, you must promptly confer in good faith with the party serving this subpoena about the following matters, or those set forth in an attachment, and you must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on your behalf about these matters:

Place:3315 S. Alameda St
Corpus Christi TX 78411**Date and Time:**March 19, 2026 10:00 AM
or 14 days after service, whichever date is laterThe deposition will be recorded by this method: Written Questions

☒ **Production:** You, or your representatives, must also bring with you to the deposition the following documents, electronically stored information, or objects, and must permit inspection, copying, testing, or sampling of the material:

All records/materials on attached Exhibit A.

As an alternative to production at the place indicated below please mail records to:

RecordTrak 651 Allendale Road, P. O. Box 61591, King of Prussia, PA 19406

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: March 2, 2026

CLERK OF COURT

OR

/S/ BARRY A. MOSCOWITZ SB# 24004830

*Signature of Clerk or Deputy Clerk**Attorney's signature*

The name, address, e-mail address, and telephone number of the attorney representing *(name of party)* _____
Defendant(s)

BARRY A. MOSCOWITZ SB# 24004830,
THOMPSON, COE, COUSINS & IRONS, LLP700 N. PEARL STREET, 25TH FLOOR, DALLAS, TX 75201,
bmoscowitz@thompsoncoe.com, (214) 871-8200**Notice to the person who issues or requests this subpoena**

If this subpoena commands the production of documents, electronically stored information, or tangible things before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)**(c) Place of Compliance.**

(1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
 - (i) is a party or a party's officer; or
 - (ii) is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

EXHIBIT A

RE: LIANA DAVIS, vs. CHRISTOPHER COOPRIDER; AID ACCESS GmbH, REBECCA GOMPERTS,
CASE NO: 2:25-cv-220
RECORDTRAK FILE #: 475675 Tag#: 11
LOCATION: CORPUS CHRISTI MEDICAL CENTER - BAY AREA
RECORDS PERTAIN TO: LIANA DAVIS DOB: 03/17/1988 SSN: ###-##-6483

Any and all billing records from 11/01/2024 to present, including but not limited to, any bills, invoices, receipts, itemized statements, financial record screen shots/print screens, CPT codes, UB forms, records reflecting payments made, adjustments, write-offs, charges, insurance records, table of billing codes, any type of correspondence, memos, bills, reports, claim forms, applications for medical benefits, office notes, every such record, including but not limited to, those existing in electronic or magnetic form and other memoranda, and every such record in the possession, custody, and control of said witness, and every such record to which the witness may have access. Including but not limited to records from 7101 S. Padre Island Dr. Corpus Christi, TX.

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

LIANA DAVIS,
Plaintiff(s),

v.

CHRISTOPHER COOPRIDER; AID ACCESS GmbH,
REBECCA GOMPERTS,
Defendant(s).

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CIVIL ACTION NO. 2:25-CV-220

DIRECT QUESTIONS TO BE PROPOUNDED TO THE WITNESS

Custodian of Records for: CORPUS CHRISTI MEDICAL CENTER - BAY AREA

Records Pertaining to: LIANA DAVIS
DOB: 03/17/1988 SSN#: 207-72-6483

Type of Records:

Any and all billing records from 11/01/2024 to present, including but not limited to, any bills, invoices, receipts, itemized statements, financial record screen shots/print screens, CPT codes, UB forms, records reflecting payments made, adjustments, write-offs, charges, insurance records, table of billing codes, any type of correspondence, memos, bills, reports, claim forms, applications for medical benefits, office notes, every such record, including but not limited to, those existing in electronic or magnetic form and other memoranda, and every such record in the possession, custody, and control of said witness, and every such record to which the witness may have access. Including but not limited to records from 7101 S. Padre Island Dr. Corpus Christi, TX.

1. Please state your full name.

Answer: _____

2. Please state by whom you are employed and the business address.

Answer: _____

3. What is the title of your position or job?

Answer: _____

4. Are these memorandum, reports, records, or data compilations, outlined in the subpoena duces tecum, pertaining to the above-named person, in your custody or subject to your control, supervision or direction?

Answer: _____

5. Are you able to identify these billing records as the originals or true copies of the originals?

Answer: _____

6. Please hand to the Officer taking this deposition copies of the billing records mentioned in question No. 4. Have you done so? If not, why?

Answer: _____

7. Are the copies which you handed to the Officer taking this deposition true and correct copies of all billing records?

Answer: _____

8. Where such billing records kept in the regular course of business of this facility?

Answer: _____

9. Please state whether or not it was the regular course of business of the above-mentioned facility for a person with the knowledge of the acts, events, conditions, opinion, or diagnoses, recorded to make the record or to transmit information thereof to be included in such record.

Answer: _____

10. Were the entries on the memoranda, reports, records, or data compilations, made at or shortly after the time of the transaction recorded on these entries?

Answer: _____

11. Please identify the total amount of the charges from your office billed for this patient for the specific time period requested in the attached Subpoena?

Answer: _____

12. What is the exact amount you have been paid on behalf of the patient and/or representatives of the patient (including any amounts paid by patient's insurance carrier(s), including Medicare/Medicaid, Champus, Texas Worker's Compensation Commission) to date for bills for the specific time period requested in the attached Subpoena?

Answer: _____

13. Identify what amounts(s) has/have been paid to you and by whom they were paid for bills for the specific time period requested in the attached subpoena. (See attached is not an acceptable answer.)

Amount: _____ Paid by: _____

Amount: _____ Paid by: _____

Amount: _____ Paid by: _____

Amount: _____ Paid by: _____

Amount: _____ Paid by: _____

14. State the amount of any adjustment(s), write-off(s) or discounts(s) that have been made on the patient's account for the **specific** time period requested in the attached Subpoena.

Answer: Amount of Adjustment: _____

Amount of Write-Off: _____

Amount of Discount: _____

15. What is the patient's current outstanding balance, if any?

Answer: _____

16. Are you currently making attempts to collect the outstanding balance from the patient, the patient's insurance carrier(s), including Medicare/Medicaid, Champus, Texas Worker's Compensation Commission or the patient(s) heirs?

Answer: _____

WITNESS (Custodian of Records)

Before me, the undersigned authority, on this day personally appeared _____, known to me to be the person whose name is subscribed to the foregoing instrument in the capacity therein stated, who being first duly sworn, stated upon his/her oath that the answers to the foregoing questions are true and correct. I further certify that the records attached hereto are exact duplicates of the original records.

SWORN TO AND SUBSCRIBED before me this _____ day of _____, 20_____.

NOTARY PUBLIC

475675.11

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

LIANA DAVIS,

Plaintiff(s),

v.

CHRISTOPHER COOPRIDER; AID ACCESS GmbH,
REBECCA GOMPERTS,

Defendant(s).

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§
§
§
§

CIVIL ACTION NO. 2:25-CV-220

**Affidavit of Records Custodian of
CORPUS CHRISTI MEDICAL CENTER - BAY AREA**

STATE OF _____
COUNTY OF _____

Before me, the undersigned authority, personally appeared _____, who, being by me duly sworn, deposed as follows:

My name is _____. I am of sound mind and capable of making this affidavit, and personally acquainted with the facts herein stated.

I am a custodian of records for **CORPUS CHRISTI MEDICAL CENTER - BAY AREA**. Attached to this affidavit are records that provide an itemized statement of the service and the charge for the service that **CORPUS CHRISTI MEDICAL CENTER - BAY AREA** provided to **LIANA DAVIS**. The attached records are a part of this affidavit.

Attached hereto are _____ page(s) of records pertaining to **LIANA DAVIS**. The attached records are kept by **CORPUS CHRISTI MEDICAL CENTER - BAY AREA** in the regular course of business, and it was the regular course of business of **CORPUS CHRISTI MEDICAL CENTER - BAY AREA** for an employee or representative of **CORPUS CHRISTI MEDICAL CENTER - BAY AREA**, with knowledge of the service provided, to make the record or to transmit information to be included in the record. The records were made in the regular course of business at or near the time or reasonably soon after the time the service was provided. The records are the original or a duplicate of the original.

The total amount paid for the services was \$_____ and the amount currently unpaid but **CORPUS CHRISTI MEDICAL CENTER - BAY AREA** has a right to be paid after any adjustments or credits is \$_____.

Affiant

SWORN TO AND SUBSCRIBED before me on the _____ day of _____, 20_____.

Notary Public, State of Texas

475675.11

Notary's Printed Name

RT#: 475675

RECORDS PERTAIN TO: LIANA DAVIS

LIANA DAVIS,	:	COURT: Usdc - Southern District Of Texas
vs.	:	TERM:
CHRISTOPHER COOPRIDER; AID	:	DOCKET: 2:25-cv-220
ACCESS GmbH, REBECCA GOMPERTS,	:	

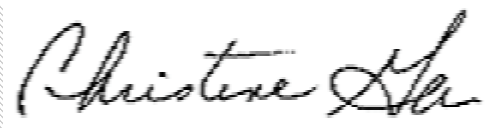
NOTICE FOR PURPOSE OF COPYING RECORDS

TO: JONATHAN F. MITCHELL
MITCHELL LAW PLLC
111 CONGRESS AVENUE
SUITE 400
AUSTIN, TX 78701

March 2, 2026
Attorney for *Plaintiff*

Please take notice that on behalf of *BARRY A. MOSCOWITZ, attorney for Defendant*, RecordTrak intends to serve a subpoena identical to the one(s) attached to this notice.

IF YOU WISH TO PURCHASE COPIES OF THE RECORDS, PLEASE CONTACT RECORDTRAK FOR PRICING AND FAX THIS CORRESPONDENCE BY March 19, 2026 TO (610) 992-1405 OR REPLY THROUGH OUR WEB SITE AT RecordTrak.com.



TX - Jessica Saldivar 210.319.1094
RECORDTRAK
651 Allendale Road
P. O. Box 61591
King of Prussia, PA 19406



651 Allendale Road
P. O. Box
61591 King of Prussia, PA 19406
Phone: (800) 220-1291
Fax: (610) 354-8946
Custodial portal: www.recordtrak.com/portal
Email: rcu@magnals.com

March 2, 2026

HIPAA STATEMENT OF ASSURANCE
PURSUANT TO 45 CFR 164.512

In the matter of: LIANA DAVIS, vs. CHRISTOPHER COOPRIDER; AID ACCESS GmbH, REBECCA GOMPERTS,

Re: CORPUS CHRISTI MEDICAL CENTER - BAY AREA (RAD) (RT #: 475675 Tag: 11)

Pertaining to: LIANA DAVIS DOB: 03/17/1988 SSN: ###-##-6483

This statement Serves to confirm that we have complied with the requirements of 45 CFR 164.512 (e)(1)(iii).

Written notice of the request for protected medical information was given to the plaintiff's attorney who is authorized to accept all legal notices to the plaintiff in this matter on 03/02/2026. (copy attached)

The notice included sufficient information to permit the individual to raise an objection.

Unless notified otherwise, by the date specified for production in the attached subpoena, the time for the individual to raise objections to the court will have elapsed without objection or will have been waived.

/s/ BARRY A. MOSCOWITZ

BARRY A. MOSCOWITZ24004830
THOMPSON, COE, COUSINS &
IRONS, LLP
700 N. PEARL STREET 25TH
FLOOR
DALLAS, TX 75201
(214) 871-8200

Attorney for Defendant(s)

Civil Action No. 2:25-cv-220

LIANA DAVIS,

vs.

**CHRISTOPHER COOPRIDER; AID ACCESS
GmbH, REBECCA
GOMPERTS,**

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UNITED STATES DISTRICT COURT

for the

SOUTHERN DISTRICT OF TEXAS

AFFIDAVIT OF EVENTS

My name is Jessica Saldivar, I am of sound mind, capable of making this affidavit and personally acquainted with the facts herein stated:

I am a Client Representative for Magna Legal Services, located at 651 Allendale Road, King of Prussia, PA 19406.

On or about 02/19/2026, we were contacted by KENNA OFLANNIGAN, a paralegal with Thompson Coe, Cousins, & Irons LLP to obtain billing records for CORPUS CHRISTI MEDICAL CENTER - BAY AREA

On March 2nd, 2026, the Subpoena was hand served and it was also served via certified mail to CORPUS CHRISTI MEDICAL CENTER - BAY AREA.

On March 16, 2026, we confirmed that request was received.

On March 23rd, 2026, we called custodian, they did not answer, we left voicemail.

On April 15th, 2026, we called custodian, call got disconnected. We called another phone number; custodian stated their billing records are now handled by chartswap.

On April 28th, 2026, we uploaded request to Chartswap.

On May 4th, 2026, we followed up with custodian, there was no response.

On May 18th, 2026, we followed up with custodian, there was no response

On June 3rd, 2026, we were advised by custodian that there was an error and to re-upload request. We re-uploaded requests on their portal.

On June 4th, 2026, we confirmed request was received and processed by Chartswap.

On June 8th, 2026, request is still being processed, they gave us estimated time frame for July, 7th 2026.

On June 10th, 2026, we followed up, we asked if we can request completed earlier. They advised they would try but could not confirm.

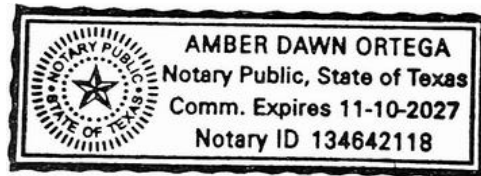
On June 15th, 2026, we followed up with custodian, there was no response.

On June 19th, 2026, affidavits of events was created.

Jessica Saldivar

Jessica Saldivar

SUBSCRIBED AND SWORN TO BEFORE ME by the above-named Affiant this 19th day of June, 2026, to certify which witness my hand and seal of office.



Amber D. Ortega

NOTARY PUBLIC, STATE OF TEXAS

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

Liana Davis,

Plaintiff,

v.

Christopher Coopriders,
Aid Access GmbH, &
Rebecca Gomperts,

Defendants.

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Case No. 2:25-cv-220

**ORDER GRANTING DEFENDANT CHRISTOPHER COOPRIDER'S
MOTION TO COMPEL NON-PARTY SUBPOENA AND DWQ**

On this day, came on for consideration Defendant Christopher Coopriders' Motion to Compel Medical Records from Non-Party, Corpus Christi Medical Center – Bay Area. Having considered the Motion, any timely filed response and arguments of counsel, the Court finds the Motion to be meritorious. It is hereby:

ORDERED, ADJUDGED, and DECREED that Defendant Christopher Coopriders' Motion to Compel Billing Records from Non-Party, Corpus Christi Medical Center – Bay Area is GRANTED.

SIGNED this _____ day of _____, 2026.

JUDGE PRESIDING